

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW HAMPSHIRE

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In Re: Brian J. Goodman

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Case No.: 25-10233-KB
Chapter 13

Debtor

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MOTION TO VACATE ORDER
GRANTING RELIEF FROM AUTOMATIC STAY

NOW COMES the Debtor and Respondent in the above-captioned matter, Brian J. Goodman, by and through his Attorneys, Raymond J. DiLucci, P.A. and Moves for the Court to Vacate the Order granting Creditor Relief from the Automatic Stay (Doc. No.: 100) and in support thereof says:

1. That Creditor filed a Motion for Relief from Stay on September 26, 2025. (Doc. No.: 80).
2. That the deadline for objections to this motion was October 15, 2025.
3. That, due to accident, mistake, and misfortune, the Objection deadline was not entered into Counsel for the Debtor's Calendar resulting in no objection being timely filed.
4. That the court granted the Motion for Relief from Stay on October 16, 2025 on the basis that no objection had been filed by the scheduled answer date. (Doc No. 100).
5. That the Debtor intends to retain this property, and will file an objection to the Motion for relief forthwith.

WHEREFORE, the Respondents respectfully request that this Honorable Court:

- A. Vacate the Order granting Creditor Relief from the Automatic Stay (Doc. No. 100); and
- B. For such other and further relief as is deemed fair, just and equitable.

Respectfully submitted,
Brian J. Goodman
By and through his Attorney,

Dated: October 16, 2025

/s/ Kathleen E. McKenzie, Esq.
Kathleen E. McKenzie, Esquire
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